



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

December 28, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area Draft Remedial Investigation Report –
Administrative Settlement Agreement and Order on Consent for Remedial
Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) reviewed the Cooperating Parties Group's (CPG) *draft Remedial Investigation (RI) Report Appendix H*, prepared by Anchor QEA in January/February 2018 and provided comments on May 17, 2018. The *revised Appendix H*, was received from the CPG on October 5, 2018 and the CPG's responses to EPA's comments were received on November 2, 2018. EPA has reviewed the *revised Appendix H* and has four remaining comment evaluations. Partner agency comments were not received on the revised *Appendix H*. In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's revised RI Report *Appendix H* with this letter.

Please proceed with revisions to Appendix H of the draft RI Report consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, please contact me to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS
Enclosure

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

LPRSA RI/FS, Remedial Investigation Report, Revised Draft Appendix H, dated October 2018

No.	Section	General or Specific	Page No.	Comment
1	Section 1.1, last paragraph and footnote 3	Specific	2	Section 1.1 Data Treatment was added in response to prior comment #30. However, prior comment #30, bullet 3 is only partially addressed. The time period of the data used to generate the regression results presented between Point-No-Point and PVSC is not clear. Clarify what period was used in the regression that produced the $R^2 = 0.84$ value presented in the footnote. For the sampling events where both measured and predicted tides are available, indicate if there is a subset where the correlation does not perform as well (e.g., moderate to high flow conditions).
2	Section 2.2, first paragraph, last sentence	Specific	6	In response to prior comment #24, this paragraph in Section 2.2 has been revised. However, reorder this conclusion sentence to place greater significance on the effects of partitioning and less significance on potential upstream and downstream sources. When data from upstream of Dundee Dam are included on spatial plots (Figures 3-1g, 3-1h, 3-2g, 3-2h), it is not clear if the Dundee Dam LMW PAH data are higher or lower than the LPR data. In addition, at the downstream end of the LPR, the RM 0 LMW PAHs are less than (Figure 1-1d) or about equal to (Figure 1-2d) the stations further upstream for most of the results displayed on the figure. LMW PAHs clearly have a lower affinity towards solids (Figure 5-1d lower left panel) as would be expected based on the physiochemical properties. For all other contaminants plotted, the concentration varies by approximately the same magnitude as the solids (approximately two orders of magnitude), and for LMW PAHs they are the least correlated and vary by about half the magnitude of the variation in solids. This difference in behavior between LMW PAHs and the other contaminants should also be specifically referenced when the discussion points to partitioning (e.g., last paragraph of section 1.1 and first paragraph of section 2.1). The second paragraph of section 2.4 specifically references LMW PAHs as requested in RTC comment #27.
3	Section 4, last paragraph and footnote 10	Specific	13 and 14	In response to prior comment #30, the last paragraph in Section 4 was revised and footnote 10 was added. However, prior comment #30, bullet 2 is only partially addressed. Given the influence of the mid-tide samples on the means presented for the other events, add some discussion to indicate if the rising and falling limb samples collected for the two high flow events included mid-tide, slack tide, or a mix of tidal conditions and how tidal conditions may have influenced the event means for those two events.
4	Section 5, last paragraph, first sentence	Specific	15	In this sentence, references to Figures 5-1b through 5-1f have been changed to reference Figures 5-2b through 5-2f. However, Figures 5-2b through 5-2f were not provided and are not mentioned in the Appendix TOC (Page vii). Confirm whether these figures are missing or the reference is incorrect.

N/A – Not applicable